

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DOUG BRIGGS, individually and as Personal
Representative of THE ESTATE OF BARBARA
DREYFUSS,

Plaintiff,

v.

LIFE CARE CENTERS OF AMERICA, INC., a
foreign corporation; LAKE VUE OPERATIONS,
LLC, a foreign limited liability company; TODD
FLETCHER, individually; and ELLIE BASHAM,
individually,

Defendants.

DARCY KOVACS, individually and as Personal
Representative of THE ESTATE OF ROBIN
HAMRICK,

Plaintiff,

v.

LIFE CARE CENTERS OF AMERICA, INC., a
foreign corporation; LAKE VUE OPERATIONS,
LLC, a foreign limited liability company; TODD
FLETCHER, individually; and ELLIE BASHAM,
individually,

Defendants.

NO. 2:21-cv-00740-MJP

**STIPULATED MOTION AND
ORDER TO DISMISS
DEFENDANT TODD FLETCHER**

**NOTE ON MOTION CALENDAR:
FEBRUARY 16, 2023**

NO. 2:21-cv-00741-MJP



STIPULATION

The Parties, by and through their respective undersigned counsel of record, move the Court for an Order dismissing Defendant Todd Fletcher. Good cause exists, and thus the Parties respectfully request that the Court grant the stipulated dismissal of Todd Fletcher.

AGREED AND STIPULATED TO this 16th day of February, 2023. We certify that this memorandum, contains 41 words, in compliance with the Local Civil Rules.

By s/ Kristin Nealey Meier

By s/ Brian D. Ernst

By s/ David L. Tift

Kristin Nealey Meier, WSBA #33562

Brian D. Ernst, WSBA #57038

David L. Tift, WSBA #13213

RYAN, SWANSON & CLEVELAND, PLLC

1201 Third Avenue, Suite 3400

Seattle, Washington 98101-3034

Tel: (206) 464-4224; Fax: (206) 583-0359

kmeier@ryanlaw.com; ernst@ryanlaw.com

tift@ryanlaw.com

Attorneys for Defendants

By s/ Jeffrey D. Boyd

By s/ Deborah M. Nelson

Jeffrey D. Boyd, WSBA #41620

Deborah M. Nelson, WSBA #23087

NELSON BOYD, PLLC

601 Union Street, Ste. 2600

Seattle, WA 98101

T: 206.971.7601; F: 206.577.5035

boyd@nelsonboydlaw.com

nelson@nelsonboydlaw.com

Attorneys for Plaintiff

Tad Thomas, KY #88577

Brian M. Jasper, KY #94428

Leslie Pescia, KY #99674

THOMAS LAW OFFICES, PLLC

9418 Norton Commons Blvd., Suite 200

Prospect, KY 40059

T: 502.473.6540

tad@thomaslawoffices.com

brian.jasper@thomaslawoffices.com

leslie.pescia@thomaslawoffices.com

Pro Hac Vice Attorneys for Plaintiff



ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 16th day of February, 2023.



Marsha J. Pechman
United States Senior District Judge

Presented by:

/s/ Kristin Nealey Meier

/s/ Brian D. Ernst

/s/ David L. Tift

Kristin Nealey Meier, WSBA #33562

Brian D. Ernst, WSBA #57038

David L. Tift, WSBA #13213

RYAN, SWANSON & CLEVELAND, PLLC

kmeier@ryanlaw.com

ernst@ryanlaw.com

tift@ryanlaw.com

Attorneys for Defendants

/s/ Jeffrey D. Boyd

/s/ Deborah M. Nelson

Jeffrey D. Boyd, WSBA #41620

Deborah M. Nelson, WSBA #23087

NELSON BOYD, PLLC

boyd@nelsonboydlaw.com

nelson@nelsonboydlaw.com

beth@nelsonboydlaw.com

Attorneys for Plaintiff

Tad Thomas, KY #88577

Brian M. Jasper, KY #94428

Leslie Pescia, KY #99674

THOMAS LAW OFFICES, PLLC

tad@thomaslawoffices.com

brian.jasper@thomaslawoffices.com

leslie.pescia@thomaslawoffices.com

Pro Hac Vice Attorneys for Plaintiff

